

23CV 696

United States Courts
Southern District of Texas
FILED

MAY 22 2023

Nathan Ochsner, Clerk of Court

In the United States District Court for the
Southern District of Texas

Clifton Neely
Plaintiff [s]

V.
Harris County Sheriffs Office
Defendant [s]

Motion For
Appointment of Counsel

Pursuant to 28 U.S.C. § 1915(e)(1) I Clifton the plaintiff moves
for an order appointing counsel to represent me in this case.

In support of this motion, I Clifton the plaintiff states:

1) I Clifton, the plaintiff issues involved in this case are
complex and is difficult to comprehend the rules expected
with the discovery to present my own case before a jury
or Judge.

2) I Clifton, the plaintiff have limited access to the Law
Library and lack knowledge of the law as well as its
legal issues.

3) I Clifton, the plaintiff will require significant research
and investigation that will be needed to verify documents
and obtain medical records that my imprisonment will
greatly limit my Ability to litigate.

4) I Clifton, the plaintiff will be unable to obtain the
statement from witnesses and counsel would be better to
cross examine witnesses.

5) I Clifton, the plaintiff will need expert testimony with
regarding information to the glaucoma.

6) I Clifton, the plaintiff is unable to afford counsel on my own,
I have made repeated efforts to obtain a lawyer from
reaching out by mail and are unable to assist or not enough staff

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Wherefore, I Clifton the plaintiff request that
the Court Appoint _____ a member of
the _____ Bar, as Counsel in this case,

May 15, 2023

Date

Clifton Medley

Signature, Print Name Below

Clifton Eugene Neely

701 N. San Jacinto, Houston, Texas 77002

Address

Affidavit

Before me, the undersigned authority personally appeared

Brenda Smith (your name), who duly sworn, deposed as

follows: My name is Clifton Eugene Neely, I am over 18

years of age, competent to make this affidavit and personally acquainted

with the facts herein stated: (in the following space write the facts/your statement)

My limited or lack of the legal system, experience, rules, the difficulties in presenting my own case before a judge or jury, the investigation that will be needed to verify documents or statement from witnesses that I'm unable to do with my medical records I'm unable to obtain on my own, Also where expert testimony will be needed And I Am unable to Afford counsel on my own.

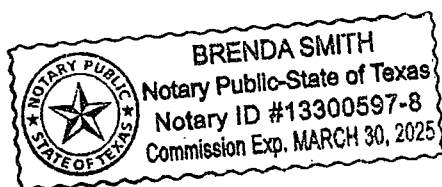
The facts stated here are voluntary.

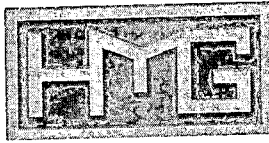
Clifton Neely
Affiant (Your Signature)

Sworn and Subscribed before me on the 16th day of May 2023

Brenda Smith

Notary Public In and for
The State of Texas





HILLIARD MARTINEZ GONZALES ^{LLP}
TRIAL ATTORNEYS

April 21, 2023

Mr. Clifton Neely
SPN:02911510 CELL:JAO75C4
701 N San Jacinto
Houston, TX 77002

Re: Your Potential Claim with Hilliard Martinez Gonzales LLP

Dear Mr. Neely,

Thank you for contacting Hilliard Martinez Gonzales LLP on April 18, 2023 in regards to a civil rights matter. Based on our investigation, we have determined that we will not be able to assist you in this matter. You should not interpret this decision as an opinion on the strength or weakness of your claim, as it is based solely upon consideration within our firm.

If you decide to pursue any claim against any individual or entity as a result of this incident, we recommend that you promptly and immediately seek other counsel. All claims are subject to statutes of limitation, which govern the time within which a lawsuit can be brought. Failure to file the suit within the applicable statute of limitation could result in the claim being permanently barred. If you delay beyond the applicable statute of limitation, your claim against any individual or entity will likely be barred, regardless of the merits of the claim.

On behalf of Hilliard Martinez Gonzales LLP, please allow me to express my deepest apologies that we are not able to assist you in this matter. If we can be of any assistance to you in the future, please do not hesitate to call us.

Sincerely,

Hilliard Martinez Gonzales, LLP
On Behalf of the Firm

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HARRIS COUNTY SHERIFF'S OFFICE JAIL

Name Clifton Eugene Neely
SPN 02911510 Cell JA07504
Street 701 N. San Jacinto
HOUSTON, TEXAS 77002



INDIGENT



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P.O. Box 61010
Houston, Texas 77208

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